



MAR 27 2001

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March 23, 2001

U.S. Environmental Protection Agency
Ms. Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Chemical Recovery Systems Site, Elyria, Ohio - General Notice of
Potential Liability and Request for Information to Hukill Chemical Corp.

Dear Ms. Sheppard-Johnson:

This firm represents Hukill Chemical Corporation ("Hukill") in connection with the Chemical Recovery Systems Site in Elyria, Ohio (the "Site"). On March 6, 2001, Hukill received a General Notice of Potential Liability and Request for Information ("General Notice") regarding the Site which purports to require Hukill to notify U.S. EPA whether it is willing to perform or finance response activities at the Site within 10 days of receipt of the General Notice letter and to respond to the Request for Information within 30 days of receipt. Pursuant to my telephone conversation with Assistant Regional Counsel Thomas Nash on March 16, 2001, U.S. EPA agreed that Hukill would have until March 23, 2001 to postmark its response to the General Notice portion of U.S. EPA's March 2, 2001 notice.

Hukill has received a copies of four "Dirty Inventory" lists provided by Mr. Nash; Hukill is identified on one of the lists with respect to two drums of muriatic acid on October 3 (presumably 1980). At this point, Hukill has been unable to confirm that it is responsible for any shipments to the Site. In fact, Hukill believes that during the relevant time period, Chemical Recovery Systems was a competitor to whom Hukill would have been unlikely to send waste for disposal. Furthermore, Hukill believes that any shipments of muriatic acid it may have made to the Site would have been pursuant to a sale to Chemical Recovery Systems for the purpose of boiler treatment or another useful purpose, rather than for waste disposal.

Very truly yours,

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Ms. Deena Sheppard-Johnson

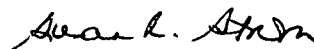
March 23, 2001

Page 2

However, Hukill's investigation regarding this matter is not yet complete. Accordingly, Hukill provides the following preliminary response at this time. Specifically, Hukill is willing to cooperate with the government and Site PRPs to finance or perform response activities at the Site if, and to the extent, it is liable under CERCLA. After Hukill completes its investigation and submits its answers to the Request for Information, it will amend this response, if necessary.

In the meantime, I would appreciate it if you would direct all future communications related to Hukill and the Site to the undersigned. Thank you.

Very truly yours,



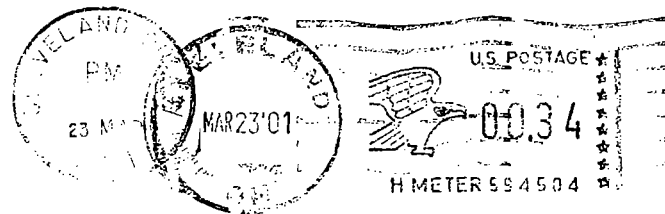
Susan R. Strom

cc: Mr. Robert Hukill
Thomas Nash, Esq.
John P. Batt, Esq.



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